



Iowa's Olmstead Consumer Task Force

July 9, 2015

Re: Non Emergency Medical Transportation (NEMT) Waiver

The Iowa Olmstead Consumer Taskforce would like to voice its strong concerns over the Department's intent to seek a continuation of the waiver of NEMT service requirements from the Iowa Health and Wellness Plan. The case made in the Waiver Amendment application, that lack of transportation has not been a barrier to I-HAWP participants, is extremely weak, and does not show significantly different results from the data submitted to CMS last fall. In response to the previous application CMS stated that the data presented "raised concerns about beneficiary access" and we strongly believe those concerns remain.

The assertion that lack of transportation is not a barrier to accessing health care runs counter to the conclusions of numerous published studies. As the Taskforce stated in its letter to you on August 15th of last year regarding I-HAWP implementation:

The importance of non-emergency medical transportation to accessing health care is well known at this point. There is ample research showing that lack of transportation reduces use of preventive and primary care. Certainly transportation issues have been a major barrier for individuals in IowaCare. Research also shows that access to transportation results in decreased use of emergency room services. (See, for example, <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2669622/>) The request for a waiver of NEMT transportation requirements in these applications undermines the Administration's own goals related to wellness and prevention.

Additional compelling research findings are in the University of Iowa's Public Policy Center's 2008 report, produced under contract to DHS and entitled *Iowa Medicaid Non-Emergency Medical Transportation System Review and Options for Improvements*. DHS used the report in the development of the current NEMT brokerage system.

If the central case the department is making is that so few people use NEMT in Iowa that it is of negligible value, the Taskforce would like to point out that when the brokerage began operations in 2010, advocates for transit dependent populations were shocked and angered to learn that information about the new service was to be communicated in direct mail only to Medicaid members who had used NEMT in the previous year. This was despite numerous comments in a 2008 stakeholder input session, noted in the PPC report, that many people were confused about their right to access NEMT. The report states "a reoccurring finding was a lack of education and understanding of transportation resources and reimbursement eligibility among Medicaid members." Not only did the Medicaid members speak of their confusion, the Medicaid workers and transportation providers identified the complexity and variation in NEMT transportation policy.

The department is no doubt also aware of the frequent criticism of the brokerage vendor's weak marketing of the NEMT service, especially in light of the fact that the broker is reimbursed on a per Medicaid member/per month basis. We believe the full potential of a well-run brokerage service remains to be tested in Iowa.

The Olmstead Taskforce fully appreciates the enormous benefits that the Iowa Health and Wellness Plan has brought to a hundred thousand Iowans, and our strong objection to the NEMT Waiver takes nothing away from what is being accomplished every day to help people live healthier, more productive lives. We also realize that NEMT services were not included in the legislation authorizing Medicaid expansion, and could not therefore be included in the Section 1115 Waiver applications submitted to the U.S. Department of Health and Human Services. We were as disappointed in these developments as we were in the Secretary's approval of Iowa's NEMT Waiver, and we will continue to convey that disappointment to the USDHHS. In the meantime, it serves no purpose to pretend there is no evidence that NEMT is a necessary element in achieving the full potential of the I-HAWP in Iowa.

Sincerely,

A handwritten signature in blue ink, appearing to read "June Klein-Bacon". The signature is fluid and cursive, with the first name "June" being more prominent.

June Klein-Bacon, Chair